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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
(MISSOULA DIVISION)

**CENTER FOR BIOLOGICAL
DIVERSITY, et al.,**

Plaintiffs,

vs.

DEB HAALAD, et al.,

Defendants;

and

Lead Case No. CV 20-181-M-DWM

Member Case No. CV 20-183-M-DWM

**DECLARATION IN SUPPORT OF
MOTION TO INTERVENE AS
PARTY-DEFENDANTS, OR IN
THE ALTERNATIVE, TO
APPEAR AS *AMICUS CURIAE***

STATE OF IDAHO, an Idaho
nonprofit corporation;

Defendant-Intervenor;

and

**IDAHO STATE SNOWMOBILE
ASSOCIATION, INC.**, an Idaho
nonprofit corporation; **IDAHO
RECREATION COUNCIL, INC.**, an
Idaho nonprofit corporation;
**COLORADO SNOWMOBILE
ASSOCIATION**, a Colorado nonprofit
organization; **BACKCOUNTRY
SLED PATRIOTS**, a Montana
nonprofit organization; **CITIZENS
OFR BALANCED USE**, a Montana
nonprofit organization; **UNITED
SNOWMOBILE ALLIANCE**, a New
Hampshire nonprofit organization;
**AMERICAN COUNCIL OF
SNOWMOBILE ASSOCIATIONS**, a
Michigan nonprofit organization; **OFF
ROAD BUSINESS ASSOCIATION**,
a California nonprofit organization;
**COLORADO OFF HIGHWAY
VEHICLE COALITION**, a Colorado
nonprofit organization; **TRAILS
PRESERVATION ALLIANCE**, a
Colorado nonprofit organization;
**UNITED FOUR WHEEL DRIVE
ASSOCIATION**, a California
nonprofit organization;
**CLEARWATER COUNTY BOARD
OF COMMISSIONERS**, a political
subdivision of the State of Idaho;
**IDAHO COUNTY BOARD OF
COMMISSIONERS**, a political
subdivision of the State of Idaho;

BONNER COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Idaho;
VALLEY COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Idaho;
ADAMS COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Idaho;
LINCOLN COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Montana;
MINERAL COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Montana;
RAVALLI COUNTY BOARD OF COMMISSIONERS, a political subdivision of the State of Montana;

Applicants for Intervention.

SANDRA F. MITCHELL, states and declares as follows:

1. I am an individual and resident of the State of Idaho, a citizen of the United States of America, am over the age of eighteen, and have personal knowledge of the facts set forth herein (except as otherwise indicated), believing them all to be true and correct to the best of my knowledge and belief.
2. I am the Public Lands Director of the Idaho State Snowmobile Association, which is one of the Applicants for Intervention in the above-titled action. As such, I am fully familiar with, knowledgeable of, and acquainted with its

organizational history, documents, records, membership, and activities of it and its members.

3. I am the Executive Director of the Idaho Recreation Council, which is one of the Applicants for Intervention in the above-titled action. As such, I am fully familiar with, knowledgeable of, and acquainted with its organizational history, documents, records, membership, and activities of it and its members.
4. The Idaho State Snowmobile Association, Inc. ("ISSA") is an Idaho nonprofit corporation representing Idaho snowmobile and over snow vehicle enthusiasts and recreation interests. Its members include individuals, family members and clubs throughout Idaho. ISSA is dedicated to preserving, protecting, and promoting snowmobiling in Idaho. ISSA members use snowmobiles (and other over snow vehicles) to access state and federally-managed lands throughout the United States and especially in Idaho and Montana, and to access adjoining wilderness and non-wilderness recreation areas.
5. The Idaho Recreation Council, Inc. ("IRC") is an Idaho nonprofit corporation representing Idaho motorized, mechanized and other recreation interests, which acts through committee(s) comprised of representatives from numerous Idaho recreation organizations, including but not limited to the Idaho State Snowmobile Association, Idaho Off-Road 4x4 Club, the Idaho State ATV Association, the Idaho Aviation Association, the Idaho Trail Machine

Association, the Western Whitewater Association, the Northwest Jet Boat Association, the Idaho UTV Association, and the Idaho Gem Club. IRC members use motorized and non-motorized means, including snowmobiles, off-highway vehicles (motorcycles, all-terrain vehicles, utility type vehicles, Jeeps/4-wheel drives), horses, llamas and mules, mountain bikes, boats (motorized and non-motorized), skiing and hiking, to access state and federally-managed lands throughout the United States and especially in Idaho and Montana, and to access adjoining wilderness and non-wilderness recreation areas.

6. On information and belief (see attesting declaration of an officer of this entity as an endnote hereof), the Colorado Snowmobile Association (“CSA”) is a Colorado nonprofit organization representing Colorado snowmobile and over snow vehicle enthusiasts and recreation interests. Its members include individuals, family members and clubs from throughout Colorado. CSA was formed to unite winter motorized recreationists across Colorado in order to advance, promote and preserve the sport of snowmobiling by working with Federal and state land management agencies and local, state and federal legislators. CSA members use snowmobiles (and other over snow vehicles) to access state and federally-managed lands throughout the United States and

especially in Colorado, and to access adjoining wilderness and non-wilderness recreation areas.

7. On information and belief (see attesting declaration of an officer of this entity as an endnote hereof), the Backcountry Sled Patriots (“Sled Patriots”) is a Montana nonprofit organization representing Montana snowmobile and over snow vehicle enthusiasts and recreation interests. Its members include clubs from throughout Montana. Sled Patriots’ mission is to help groups keep back country (primitive) snowmobile areas open while practicing good stewardship of the land. Sled Patriots funds and supports legal actions to preserve backcountry riding opportunities and engages in legislative and forest planning efforts for the same purpose. Sled Patriots members use snowmobiles (and other over snow vehicles) to access state and federally-managed lands throughout the United States and especially in Montana, and to access adjoining wilderness and non-wilderness recreation areas.
8. On information and belief (see attesting declaration of an officer of this entity as an endnote hereof), Citizens for Balanced Use (“CBU”) is a Montana nonprofit organization representing Idaho and Montana recreationists of all kinds and interests, motorized and non-motorized. It has individual members from throughout Idaho, Montana and the Rocky Mountain region generally. CBU’s mission is to preserve and protect our Nation’s last remaining areas

open to multiple use recreation in the Rocky Mountain region while advocating for active forest management and responsible resource development of federally-managed public lands. CBU's members use snowmobiles (and other over snow vehicles and off-road vehicles) to access state and federally-managed lands throughout the United States and especially in the Rocky Mountain region, as well as adjoining wilderness and non-wilderness recreation areas.

9. On information and belief (see attesting declaration of an officer of this entity as an endnote hereof), the United Snowmobile Alliance ("USA") is a New Hampshire nonprofit organization representing snowmobile and over snow vehicle enthusiasts and recreation interests throughout the United States. It has members composed of state snowmobile associations and clubs from throughout the United States. USA is dedicated to the preservation and promotion of environmentally responsible organized snowmobiling and the creation of safe and sustainable snowmobiling in the United States. USA members, and their individual members, use snowmobiles (and other over snow vehicles) to access state and federally-managed lands throughout the United States to access winter recreation areas.

10. On information and belief (see attesting declaration of an officer of this entity as an endnote hereof), the American Council of Snowmobile Associations

(“ACSA”) is a Michigan nonprofit organization representing snowmobile and over snow vehicle enthusiasts and recreation interests throughout the United States. ACSA provides national leadership and coordination to advance the efforts of all organizations that promote responsible snowmobiling across the United States. ACSA is comprised of state snowmobile associations, clubs and individuals from across the United States. ACSA promotes snowmobiling as a safe, fun and environmentally friendly family sport. ACSA members use snowmobiles (and other over snow vehicles) to access state and federally-managed lands throughout the United States to access winter recreation areas.

11. On information and belief (see attesting declaration of an officer of this entity as an endnote hereof), the Off Road Business Association (“ORBA”) is a California-based international trade association whose membership ranges from large international corporations to “Mom & Pop” small businesses, and other state, regional and national “Grassroots” organizations and associations. Its mission is to promote responsible and meaningful recreation opportunity on public and private land by providing a working collaborative platform for business to communicate and develop a positive atmosphere and provide information necessary for success. ORBA’s members manufacture, distribute and sell snowmobiles (and other over snow vehicles and off-road vehicles)

used to access winter recreation areas on state and federally-managed lands throughout the United States.

12. On information and belief (see attesting declaration of an officer of this entity as an endnote hereof), the Colorado Off Highway Vehicle Coalition (“COHVCO”) is a Colorado nonprofit organization representing Colorado off road motorized recreation enthusiasts and recreation interests. Its members include individuals, family members and clubs from throughout Colorado. COHVCO was formed to protect motorized access to public lands across Colorado in order to advance, promote and preserve the sport of off road recreation by working with Federal and state land management agencies and local, state and federal legislators. COHVCO members use snowmobiles (and other over snow vehicles and off highway vehicles) to access state and federally-managed lands throughout the United States and especially in Colorado, and to access adjoining wilderness and non-wilderness recreation areas.

13. On information and belief (see attesting declaration of an officer of this entity as an endnote hereof), the Trails Preservation Alliance (“TPA”) is a Colorado nonprofit organization representing Colorado off road motorized recreation (primarily dirt bikes) enthusiasts and recreation interests. Its members include individuals, family members and clubs from throughout Colorado. TPA was

formed to protect motorized access to public lands across Colorado in order to advance, promote and preserve the sport of off road recreation by working with Federal and state land management agencies and local, state and federal legislators. TPA members use snowmobiles (and other over snow vehicles and off highway vehicles) to access state and federally-managed lands throughout the United States and especially in Colorado, and to access adjoining wilderness and non-wilderness recreation areas.

14. On information and belief (see attesting declaration of an officer of this entity as an endnote hereof), the United Four Wheel Drive Associations (“U4WDA”) is a California nonprofit organization representing Jeep and 4-Wheel Drive enthusiasts and recreation interests throughout the United States and internationally. Its members include individuals, family members and clubs from throughout Colorado. U4WDA was formed to protect motorized access to public lands across the United States in order to advance, promote and preserve the sport of off road recreation by working with Federal and state land management agencies and local, state and federal legislators. U4WDA members use snowmobiles (and other over snow vehicles and off highway vehicles) to access state and federally-managed lands throughout the United States, and to access adjoining wilderness and non-wilderness recreation areas.

15. Further and hereafter herein I shall refer to the organizations outlined above in paragraphs 4 through 14 – IRC, ISSA, CSA, Sled Patriots, CBU, USA, ACSA, ORBA, COHVCO, TPA, and U4WDA – as the “Recreation Interests.” While I am an officer or director in ISSA and IRC, in that capacity I work regularly and closely with all of the Recreation Interests and am familiar with their operations, positions, memberships, goals and objectives, as we work together in collaboration on many activities.

16. On information and belief (see attesting declaration of a county commissioner as an endnote hereof), the Board of Commissioners of Clearwater County, Idaho (“Clearwater County”) is a political subdivision of the State of Idaho organized under the general laws of the State of Idaho, and the governing body of the same. Citizens of Clearwater County include local business persons, property owners and residents. These citizens, as well as Clearwater County itself, share a common appreciation of and for federally-owned and managed lands within Clearwater County’s jurisdictional boundaries, including the geological areas and natural features encompassed thereby, the forestlands encompassed thereby, the river systems encompassed thereby, and most importantly the recreational access and opportunity provided thereby. Clearwater County and its citizens and visitors have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of

access, recreational, aesthetic, and commercial activities within the federally-owned and managed lands within Clearwater County's jurisdictional boundaries, which requires continued access and use of federal public lands, including winter snowmobile use thereof. The local economy of Clearwater County is significantly stimulated by winter recreation activity contributing an estimated \$1,590,367 annually in snowmobiler trip expenditures and \$96,210 annually in snowmobiler capital expenditures. (See Idaho State Parks & Recreation, Economic Impact and Importance of Snowmobiling, off-highway vehicle and power Boating in Idaho, 2016 and 2017). To a rural county with a local population of approximately 9,000 (per 2010 census), this economic contribution is vital to the success of locals.

17. On information and belief (see attesting declaration of a county commissioner as an endnote hereof), the Board of Commissioners of Idaho County, Idaho ("Idaho County") is a political subdivision of the State of Idaho organized under the general laws of the State of Idaho, and the governing body of the same. Citizens of Idaho County include local business persons, property owners and residents. These citizens, as well as Idaho County itself, share a common appreciation of and for federally-owned and managed lands within Idaho County's jurisdictional boundaries, including the geological areas and natural features encompassed thereby, the forestlands encompassed thereby,

the river systems encompassed thereby, and most importantly the recreational access and opportunity provided thereby. Idaho County and its citizens and visitors have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of access, recreational, aesthetic, and commercial activities within the federally-owned and managed lands within Idaho County's jurisdictional boundaries, which requires continued access and use of federal public lands, including winter snowmobile use thereof. The local economy of Idaho County is significantly stimulated by winter recreation activity contributing an estimated \$2,799,280 annually in snowmobiler trip expenditures and \$1,056,485 annually in snowmobiler capital expenditures. (See Idaho State Parks & Recreation, Economic Impact and Importance of Snowmobiling, off-highway vehicle and power Boating in Idaho, 2016 and 2017). To a rural county with a local population of approximately 16,000 (per 2010 census), this economic contribution is vital to the success of locals.

18. On information and belief (see attesting declaration of a county commissioner as an endnote hereof), the Board of Commissioners of Bonner County, Idaho ("Bonner County") is a political subdivision of the State of Idaho organized under the general laws of the State of Idaho, and the governing body of the same. Citizens of Bonner County include local business persons, property

owners and residents. These citizens, as well as Bonner County itself, share a common appreciation of and for federally-owned and managed lands within Bonner County's jurisdictional boundaries, including the geological areas and natural features encompassed thereby, the forestlands encompassed thereby, the river systems encompassed thereby, and most importantly the recreational access and opportunity provided thereby. Bonner County and its citizens and visitors have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of access, recreational, aesthetic, and commercial activities within the federally-owned and managed lands within Bonner County's jurisdictional boundaries, which requires continued access and use of federal public lands, including winter snowmobile use thereof. The local economy of Bonner County is significantly stimulated by winter recreation activity contributing an estimated \$6,857,143 annually in snowmobiler trip expenditures and \$1,154.795 annually in snowmobiler capital expenditures. (See Idaho State Parks & Recreation, Economic Impact and Importance of Snowmobiling, off-highway vehicle and power Boating in Idaho, 2016 and 2017). To a rural county with a local population of approximately 40,000 (per 2010 census), this economic contribution is vital to the success of locals.

19. On information and belief (see attesting declaration of a county commissioner as an endnote hereof), the Board of Commissioners of Valley County, Idaho (“Valley County”) is a political subdivision of the State of Idaho organized under the general laws of the State of Idaho, and the governing body of the same. Citizens of Valley County include local business persons, property owners and residents. These citizens, as well as Valley County itself, share a common appreciation of and for federally-owned and managed lands within Valley County’s jurisdictional boundaries, including the geological areas and natural features encompassed thereby, the forestlands encompassed thereby, the river systems encompassed thereby, and most importantly the recreational access and opportunity provided thereby. Valley County and its citizens and visitors have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of access, recreational, aesthetic, and commercial activities within the federally-owned and managed lands within Valley County’s jurisdictional boundaries, which requires continued access and use of federal public lands, including winter snowmobile use thereof. The local economy of Valley County is significantly stimulated by winter recreation activity contributing an estimated \$36,370,631 annually in snowmobiler trip expenditures and \$1,471,826 annually in snowmobiler capital expenditures. (See Idaho State Parks & Recreation, Economic Impact

and Importance of Snowmobiling, off-highway vehicle and power Boating in Idaho, 2016 and 2017). To a rural county with a local population of approximately 10,000 (per 2010 census), this economic contribution is vital to the success of locals.

20. On information and belief (see attesting declaration of a county commissioner as an endnote hereof), the Board of Commissioners of Adams County, Idaho (“Adams County”) is a political subdivision of the State of Idaho organized under the general laws of the State of Idaho, and the governing body of the same. Citizens of Adams County include local business persons, property owners and residents. These citizens, as well as Adams County itself, share a common appreciation of and for federally-owned and managed lands within Adams County’s jurisdictional boundaries, including the geological areas and natural features encompassed thereby, the forestlands encompassed thereby, the river systems encompassed thereby, and most importantly the recreational access and opportunity provided thereby. Adams County and its citizens and visitors have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of access, recreational, aesthetic, and commercial activities within the federally-owned and managed lands within Adams County’s jurisdictional boundaries, which requires continued access and use of federal public lands, including winter snowmobile use thereof. The

local economy of Adams County is significantly stimulated by winter recreation activity contributing an estimated \$3,091,126 annually in snowmobiler trip expenditures and \$120,895 annually in snowmobiler capital expenditures. (See Idaho State Parks & Recreation, Economic Impact and Importance of Snowmobiling, off-highway vehicle and power Boating in Idaho, 2016 and 2017). To a rural county with a local population of approximately 4,000 (per 2010 census), this economic contribution is vital to the success of locals.

21. On information and belief (see attesting declaration of a county commissioner as an endnote hereof), the Board of Commissioners of Lincoln County, Montana (“Lincoln County”) is a political subdivision of the State of Montana organized under the general laws of the State of Montana, and the governing body of the same. Citizens of Lincoln County include local business persons, property owners and residents. These citizens, as well as Lincoln County itself, share a common appreciation of and for federally-owned and managed lands within Lincoln County’s jurisdictional boundaries, including the geological areas and natural features encompassed thereby, the forestlands encompassed thereby, the river systems encompassed thereby, and most importantly the recreational access and opportunity provided thereby. Lincoln County and its citizens and visitors have used and enjoyed, and hope

for themselves and future generations to use and enjoy, a variety of access, recreational, aesthetic, and commercial activities within the federally-owned and managed lands within Lincoln County's jurisdictional boundaries, which requires continued access and use of federal public lands, including winter snowmobile use thereof. The local economy of Lincoln County is significantly stimulated by winter recreation activity recreation activity is a significant economic contributor that is vital to the success of locals.

22. On information and belief (see attesting declaration of a county commissioner as an endnote hereof), the Board of Commissioners of Mineral County, Montana ("Mineral County") is a political subdivision of the State of Montana organized under the general laws of the State of Montana, and the governing body of the same. Citizens of Mineral County include local business persons, property owners and residents. These citizens, as well as Mineral County itself, share a common appreciation of and for federally-owned and managed lands within Mineral County's jurisdictional boundaries, including the geological areas and natural features encompassed thereby, the forestlands encompassed thereby, the river systems encompassed thereby, and most importantly the recreational access and opportunity provided thereby. Mineral County and its citizens and visitors have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of access,

recreational, aesthetic, and commercial activities within the federally-owned and managed lands within Mineral County's jurisdictional boundaries, which requires continued access and use of federal public lands, including winter snowmobile use thereof. The local economy of Mineral County is significantly stimulated by winter recreation activity recreation activity is a significant economic contributor that is vital to the success of locals.

23. On information and belief (see attesting declaration of a county commissioner as an endnote hereof), the Board of Commissioners of Ravalli County, Montana ("Ravalli County") is a political subdivision of the State of Montana organized under the general laws of the State of Montana, and the governing body of the same. Citizens of Ravalli County include local business persons, property owners and residents. These citizens, as well as Ravalli County itself, share a common appreciation of and for federally-owned and managed lands within Ravalli County's jurisdictional boundaries, including the geological areas and natural features encompassed thereby, the forestlands encompassed thereby, the river systems encompassed thereby, and most importantly the recreational access and opportunity provided thereby. Ravalli County and its citizens and visitors have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of access, recreational, aesthetic, and commercial activities within the federally-owned

and managed lands within Ravalli County's jurisdictional boundaries, which requires continued access and use of federal public lands, including winter snowmobile use thereof. The local economy of Ravalli County is significantly stimulated by winter recreation activity recreation activity is a significant economic contributor that is vital to the success of locals.

24. Further and hereafter herein I shall refer to the counties outlined above in paragraphs 16 through 23 – Clearwater County, Idaho County, Bonner County, Valley County, Adams County, Lincoln County, Mineral County, and Ravalli County – as the “County Interests.” In my capacity as an officer and director in ISSA and IRC, I work regularly and closely with all of the County Interests and am familiar with their operations, positions, citizenry, goals and objectives, as we work together in collaboration on many activities.

25. The Recreation Interests and the County Interests shall be referred to collectively herein as “Applicants.”

26. The Recreation Interests and their members have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of recreational, aesthetic, and commercial activities within the federally-managed public lands of the American West and the United States more generally, which require continued use and access to federally-owned and managed public lands, in particular by means of motorized travel and over

snow vehicles. These activities (including thrill-seeking, adventure, pleasure, sightseeing, hunting, fishing, camping, wildlife and plant viewing, photography and travel) require motorized access.

27. The County Interests and their citizens and visitors have used and enjoyed, and hope for themselves and future generations to use and enjoy, a variety of recreational, aesthetic, and commercial activities within the federally-managed public lands within the respective county boundaries, which require continued use and access to federally-owned and managed public lands, in particular by means of motorized travel and over snow vehicles. These activities (including thrill-seeking, adventure, pleasure, sightseeing, hunting, fishing, camping, wildlife and plant viewing, photography and travel) require motorized access.

28. The Recreation Interests are regularly, thoroughly and cooperatively involved at local, state, regional and federal levels to protect and promote the legislative, regulatory and legal interests of their membership, particularly as it pertains to recreational access to and use of federal public lands. The foregoing often involves the Recreation Interests promoting and defending the interests of motorized recreationists in administrative and legal processes that may, or have the potential to, impact their recreation and sport.

29. The Recreation Interests and their members, and the County Interests, regularly attend public meetings, submit input, and otherwise participate in collaborative groups, planning processes, research projects and study activities of federal agencies, including those initiated by or coordinated by the U.S. Fish and Wildlife Service (“Service”). The Recreation Interests and County Interests are actively involved in travel management planning and land use planning activities on lands owned and/or managed by the U.S. Forest Service and the U.S. Bureau of Land Management, which often involves review, comment and analysis upon biological opinions of the Service, as well as other NEPA and ESA implications. The Recreation Interests recruit volunteers and contract-for-pay with individuals that have scientific and technical expertise to assist in the foregoing. The County Interests use their commissioners and public employees to provide the same insight.

30. The Recreation Interests support a truly collaborative framework for recreation enthusiasts and environmental interests to work together in cooperation with land managers, legislators, local government and the public to ensure a positive future for responsible recreation access for everyone, now and into the future.

31. The Recreation Interests and their members, and the County Interests and their citizens and visitors, have enjoyed the motorized use of federal lands. For

some, over snow vehicles and off-highway vehicles are primarily used to provide access to points of interest or to gain entry to wilderness areas, while for others (particularly over snow vehicles such as snowmobiles) riding the designated areas and trails is the primary reason they visit federal lands. Motorized travel on federal lands is a tremendous recreation asset, as well as an increasingly significant economic asset for local counties and communities. Accordingly, preserving responsible motorized access to federal lands is an extremely high priority for the Recreation Interests and the County Interests.

32. Snowmobiling and winter recreation activity is an essential element of, and stabilizing force to, regional, state and local economies in the American West. By way of example, in the State of Idaho, annual snowmobiler trip expenditures are nearly \$162 million and annual snowmobiler capital expenditures are nearly \$62 million. The total annual economic output of snowmobile recreation in Idaho, when value added components are included, exceeds \$223 million. (See Idaho State Parks & Recreation, Economic Impact and Importance of Snowmobiling, off-highway vehicle and power Boating in Idaho, 2016 and 2017). See also *Declaration of Joshua Uriarte*, Dkt. 13-1, at ¶ 8.

33. The Recreation Interests and the County Interests have significant interests at stake in this action. A decision in Plaintiffs' favor threatens the economic vitality of local communities and presents the likelihood of loss of winter motorized access for snowmobiling and other recreation. The result may well be a decline in local economies, loss of recreation and aesthetic enjoyment, including for simple enjoyment of the environment, appreciation of historic and cultural resources, for the intrinsic enjoyment of leisure travel in nature, to sightsee, to hunt, to fish, to camp and adventure, to view wildlife, to view plants, to bird watch, to seek thrill, to engage in photography, and to entertain family and friends. Plainly, the Recreation Interests and the persons they represent, and the County Interests and the citizens they represent, have a strong interest in the outcome of this action.

34. The groups composed of the Recreation Interests, and their individual members, and representatives of the County Interests have attended public meetings, submitted input to the Service, or otherwise monitored and participated in the process that generated the Service's October 13, 2020 decision at issue in this case, and matters ancillary thereto, particularly as it relates to travel management planning of federal land managers.

35. ISSA employs and solicits opinions from scientific and technical experts, and also reviews scientific and technical literatures, with regard to the matters at

issue in this case, particularly with respect to North American wolverine, their habitat and biology, and any effects on the population of the same that may be attributable to winter motorized recreation. On information and belief derived therefrom, Recreation Interests have been able to receive technical support and assistance with respect to monitoring and commenting on wolverine management and policy as it relates to winter motorized travel. Through the same I have become familiar with the North American wolverine's history in the northern latitudes of the United States, and the procedural history of the withdrawal of its proposed ESA listing. Recreation Interests have become informed as it relates to the wolverine's life history needs, seasonal habitat use, behaviors, and current and projected future conditions based on potential stressors to the species. This has involved review of available literature on the subject and scientific data. Through the available research, literature and information, including consultation with experts in the field, Recreation Interests have been able to provide informed comments that have been prepared and submitted on behalf of Recreation Interests with respect to winter motorized travel planning on federal public lands. In comments submitted on behalf of Recreation Interests I have emphasized the use of best available science and data, and that the same indicates that the wolverine is well distributed and secure across its true

historic range (which really does not include any significant portions of the contiguous United States), and consequently wolverine is not warranted for ESA designation and wolverine protection is not a basis to limit or restrict winter motorized travel on federal public lands.

36. On information and belief, “[a]n ESA listing invokes additional procedural requirements, often accompanied by additional restrictions, regarding activities on federal lands. Limitations or delays in activities on federal lands may, in turn, negatively impact the economic interests of the State and its citizens. These impacts are often burdened disproportionately by counties and localities with high percentages of federal land ownership. This makes it critically important to avoid unnecessary ESA listings so the significant restrictions that accompany them are not unnecessarily imposed on Idaho’s citizens or their economic interests.” See Declaration of Joshua Uriarte, Dkt. 13-1, at ¶ 9. “Under federal land management regulations, the formal proposal of a species for ESA listing invokes certain requirements that can delay or limit federal agency actions.” *Id.*, at ¶ 10. “ESA listings, and even proposed listings, affect the prioritization of conservation resources.” *Id.*, at ¶ 11.

37. Consequently, any ESA action with respect to wolverine that is unwarranted or unfounded will likely result in reduced winter motorized recreation opportunity for the Recreation Interests, will harm economic interests

important to the County Interests, and will impair the ability of all persons to use and enjoy federal public lands.

38. Plaintiffs make clear in their allegations that they believe “disturbance from winter recreation activities . . . disrupt wolverine habitat use.” See First Amended Complaint, Dkt. 5, at ¶ 4. Plaintiffs further challenge the validity of the Service’s determination that wolverine can maintain residency in areas with winter motorized recreation use. *Id.*, at ¶ 103. It is clear, therefore, that a decision in favor of Plaintiffs in this action will be used as a bootstrap to limit and reduce winter motorized recreation activity for the Recreation Interests and the areas they enjoy, and in the areas of influence of the County Interests.

39. The assertions Plaintiffs will rely on to curtail winter motorized recreation activity is unfounded. On my information and belief, in consultation with IRC’s technical expert, the populations of North American wolverine in the contiguous United States are at the extreme south boundary of their distribution – their historical home range is in Canada. Wolverine are, by nature, low density, have large home ranges, and exhibit long-range movements. The distribution information available for wolverine suggests records of occurrence and do not necessarily translate to occupancy. Due to the foregoing, it is very difficult to collect and monitor population data,

specifically the number of wolverine in a geographic area. There is no historic population data with which to measure and evaluate current population estimates. Recent research data regarding external factors affecting wolverine has not documented negative impacts at the population level. It is important that the court be informed with respect to these issues, and winter motorized recreation impacts, or the lack thereof, by those with the most direct interest in that recreation.

40.If the Service is found to have wrongly dismissed the threat of winter recreation activities in the habitat area of the wolverine when making its decision to remove the ESA listing the wolverine as a threatened species, then recreational activity in the areas within the wolverine's habitat will be restricted, and most likely curtailed. This will effect substantial interests of the Recreation Interests and the County Interests.

41.By reason of all of the above and foregoing, I submit that the Recreation Interests and the County Interests clearly have discrete, personal interests that do not belong to the general public. Applicants' members are specific groups which will potentially suffer and be threatened by the Service's decision whether or not to list the wolverine as a threatened species. Given Applicants' experience with other snowmobiling areas being threatened and/or restricted due to threatened species listings, Applicants are in a unique position to

explain their interests which are at stake in this litigation, and explain how the Service's decision at issue in this action affects them.

42. In accordance with the requirements of 28 U.S.C. § 1746, I declare under penalty of perjury that the within and foregoing is true and correct.


DATED this 24 day of August, 2021.

by: Sandra F. Mitchell
Sandra F. Mitchell

ENDNOTES – ADDITIONAL VERIFICATION OF DECLARATION

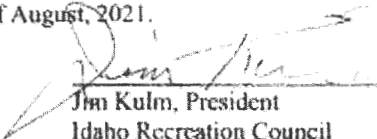
In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is President of the Idaho State Snowmobile Association; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this 24th day of August, 2021.


Larry Laxson, President
Idaho State Snowmobile Association

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is President of the Idaho Recreation Council; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.


Jim Kulm, President
Idaho Recreation Council

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the Executive Director of the Colorado Snowmobile Association; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Scott Jones, Executive Director
Colorado Snowmobile Association

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the President of the

DECLARATION IN SUPPORT OF MOTION TO INTERVENE AS PARTY-DEFENDANTS,
OR IN THE ALTERNATIVE, TO APPEAR AS *AMICUS CURIAE* – Page 30

ENDNOTES – ADDITIONAL VERIFICATION OF DECLARATION

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is President of the Idaho State Snowmobile Association; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Larry Laxson, President
Idaho State Snowmobile Association

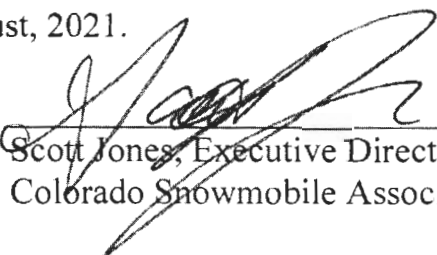
In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is President of the Idaho Recreation Council; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Jim Kulm, President
Idaho Recreation Council

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the Executive Director of the Colorado Snowmobile Association; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this 24 day of August, 2021.




Scott Jones, Executive Director
Colorado Snowmobile Association

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the President of the

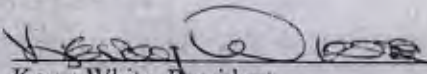
Backcountry Sled Patriots; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this 30 day of August, 2021.


Stan Spencer, President
Backcountry Sled Patriots

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the President of Citizens for Balanced Use; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this 24 day of August, 2021.


Kerry White, President
Citizens for Balanced Use

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the Vice Chair of the United Snowmobile Alliance; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Scott Jones, Vice Chair
United Snowmobile Alliance

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the President of the American Council of Snowmobile Associations; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DECLARATION IN SUPPORT OF MOTION TO INTERVENE AS PARTY-DEFENDANTS,
OR IN THE ALTERNATIVE, TO APPEAR AS *AMICUS CURIAE* – Page 31

Backcountry Sled Patriots; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Stan Spencer, President
Backcountry Sled Patriots

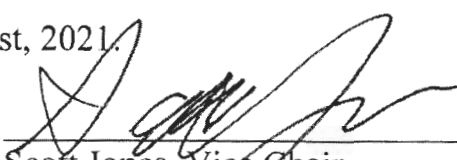
In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the President of Citizens for Balanced Use; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Kerry White, President
Citizens for Balanced Use

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the Vice Chair of the United Snowmobile Alliance; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

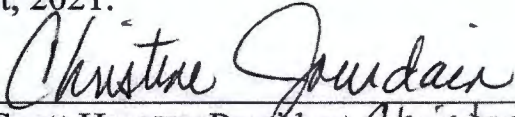
DATED this 24 day of August, 2021.



Scott Jones, Vice Chair
United Snowmobile Alliance

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is the President of the American Council of Snowmobile Associations; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.


~~Scott Herzog, President~~ Christine Jourdain
American Council of Snowmobile Executive Director
Associations

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is an agent/officer of the Off-Road Business Association; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:
Title:
Off-Road Business Association

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is an agent/officer of the Colorado Off Highway Vehicle Coalition; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:
Title:
Colorado Off Highway Vehicle Coalition

DATED this ____ day of August, 2021.

Scott Herzog, President
American Council of Snowmobile
Associations

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is an agent/officer of the Off-Road Business Association; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this 24 day of August, 2021.

Print Name: Scott Jones
Title: Authorized Rep
Off-Road Business Association


In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is an agent/officer of the Colorado Off Highway Vehicle Coalition; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this 24 day of August, 2021.

Print Name: Scott Jones
Title: Authorized Rep
Colorado Off Highway Vehicle Coalition

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is an agent/officer of the Trails Preservation Alliance; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this 24 day of August, 2021.


Print Name: Scott Jungs
Title: Authorized Rep
Trails Preservation Alliance

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is an agent/officer of the United Four Wheel Drive Associations; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this 24 day of August, 2021.


Print Name: Scott Jungs
Title: Authorized Rep
United Four Wheel Drive Associations

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Clearwater County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:
Commissioner, Clearwater County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Idaho

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is an agent/officer of the Trails Preservation Alliance; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:
Title:
Trails Preservation Alliance

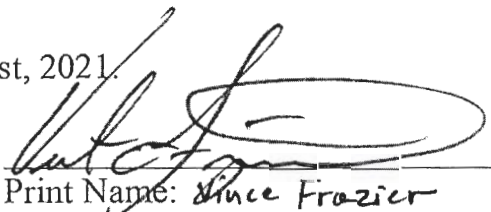
In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is an agent/officer of the United Four Wheel Drive Associations; and (2) that the facts set forth herein with respect to said entity, and with respect to its organizational interest and organizational involvement as a Recreational Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:
Title:
United Four Wheel Drive Associations

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Clearwater County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this 26th day of August, 2021.



Print Name: Vince Frazier
Commissioner, Clearwater County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Idaho

County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this 24 day of August, 2021.


Print Name: R. Skipper Brandt
Commissioner, Idaho County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Bonner County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:
Commissioner, Bonner County

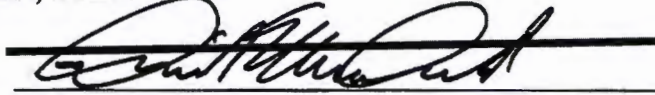
In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Valley County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:
Commissioner, Valley County

County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

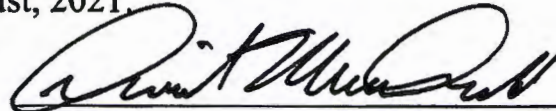
~~DATED this 25 day of August, 2021.~~



~~Print Name: Dan McDonald~~
Commissioner, Idaho County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Bonner County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

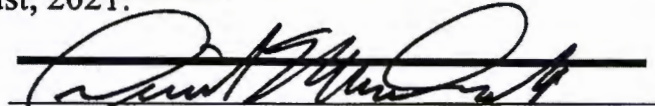
DATED this 25 day of August, 2021.



Print Name: Dan McDonald
Commissioner, Bonner County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Valley County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

~~DATED this 25 day of August, 2021.~~



~~Print Name: Dan McDonald~~
Commissioner, Valley County

County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:

Commissioner, Idaho County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Bonner County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:

Commissioner, Bonner County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Valley County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this 27 day of August, 2021.



DAVID BINGAMAN

Print Name:

Commissioner, Valley County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Adams County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this 27th day of August, 2021. *Mike E. PARADIS*

Mike E. Paradis

Print Name:

Commissioner, Adams County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Lincoln County, Montana; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:

Commissioner, Lincoln County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Mineral County, Montana; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:

Commissioner, Mineral County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Ravalli County, Montana; and (2) that the facts set forth herein with respect to said

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Adams County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:

Commissioner, Adams County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Lincoln County, Montana; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this 24th day of August, 2021.

Serry Bennett
Print Name:

Commissioner, Lincoln County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Mineral County, Montana; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:

Commissioner, Mineral County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Ravalli County, Montana; and (2) that the facts set forth herein with respect to said

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Adams County, Idaho; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:

Commissioner, Adams County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Lincoln County, Montana; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:

Commissioner, Lincoln County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Mineral County, Montana; and (2) that the facts set forth herein with respect to said county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this 27th day of August, 2021.

Roman Zylawy
Print Name:
Commissioner, Mineral County

In accordance with the requirements of 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that (1) the undersigned is a commissioner of Ravalli County, Montana; and (2) that the facts set forth herein with respect to said

county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this ____ day of August, 2021.

Print Name:

Commissioner, Ravalli County

county, and with respect to its governmental interest and official involvement as a County Interest group, are true and correct.

DATED this 26 day of August, 2021.

Don Hols
Print Name:
Commissioner, Ravalli County

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the following on this 30th day of August, 2021, by the following method:

AMANDA DALMENDRAY GALVAN
TIMOTHY J. PRESO
EARTHJUSTICE LEGAL DEFENSE
FUND – BOZEMAN

313 East Main Street
Bozeman, MT 59715
Telephone: (406) 586-9699
Facsimile: (406) 586-9695

Email: agalvan@earthjustice.org;
tpreso@earthjustice.org

*Attorneys for Center for Biological Diversity,
Conservation Northwest, Defenders of
Wildlife, Friends of the Clearwater, Greater
Yellowstone Coalition, Idaho Conservation
League, Jackson Hole Conservation Alliance,
Klamath-Siskiyou Wildlands Center, Rocky
Mountain Wild and Sierra Club*

☐ U.S. First Class Mail, Postage Prepaid
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☐ Federal Express
☐ Hand Delivery
☐ Facsimile
☒ iCourt / Electronic Mail or CM/ECF

KAMELA A. CASCHETTE
RANDY J. TANNER
U.S. DEPARTMENT OF JUSTICE

Environmental & Natural Resources Div.
Ben Franklin Station
PO Box 7611
Washington, DC 20044-7611
Telephone: (202) 305-0340
Facsimile: (202) 305-0275

Email: kamela.caschette@usdoj.gov;
randy.tanner@usdoj.gov

*Attorneys for Scott de la Vega, Martha
Williams, United States Fish and Wildlife
Service*

☐ U.S. First Class Mail, Postage Prepaid
☐ U.S. Certified Mail, Postage Prepaid
☐ Federal Express
☐ Hand Delivery
☐ Facsimile
☒ iCourt / Electronic Mail or CM/ECF

OWEN H. MORONEY
IDAHO OFFICE OF THE ATTORNEY
GENERAL

2117 North 17th Street

Boise, ID 83702

Telephone: (208) 287-2875

Facsimile (208) 334-2148

Email: owen.moroney@idfg.idaho.gov

Attorneys for State of Idaho

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☐ U.S. Certified Mail, Postage Prepaid

☐ Federal Express

☐ Hand Delivery

☐ Facsimile

☒ iCourt / Electronic Mail or CM/ECF

MONFORTON LAW OFFICES, PLLC

by: /s/ Matthew G. Monforton
Matthew G. Monforton